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> IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)

IN RE: CHAPTER 13

ADAM M. WEISBAUM Bankruptcy No. 21-10200-amc

Debtor

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

Please take notice that the undersigned hereby enters her appearance as counsel for and on behalf of National Capital Management, L.P. ("NCM") and hereby requests, pursuant to Rule

9010(b) of the Federal Rule of Bankruptcy Procedure (the "Rule"); and, pursuant to Rules 2002

and 9001 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 342, that copies of all

notices and pleadings given or filed in this case be given and served upon the party listed below

at the following address and telephone number:

Leona Mogavero, Esquire

Friedman Schuman, P.C.

101 Greenwood Avenue, Suite 500

Jenkintown, PA 19046

Telephone: (215) 635-7200

Facsimile: (215) 635-7212

LMogavero@fsalaw.com

Please take further notice that the foregoing request includes not only the notice and

papers referred to in the Rules specified above, but also includes, without limitation, any order,

notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or

informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone,

telegraph, telex, or otherwise filed or made with regard to the referenced case and proceeding

herein.

This Notice of Appearance and Request for Service of Papers, and any subsequent

appearance, pleading, claim, or suit, shall not be deemed or construed to be waiver of NCM's

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right (i) to have final orders in non-core matters entered only after <u>de novo</u> review by a district judge, (ii) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto, (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which NCM is or may be entitled, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments NCM expressly

Respectfully submitted,

Dated: January 29, 2021

reserves.

Leona Mogavero, Esquire Friedman Schuman, P.C. 101 Greenwood Avenue, Suite 500 Jenkintown, PA 19046

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Counsel for National Capital Management, L.P.

Y. Mogavero